

THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

In the Matter of:

Investigation by the Department of Telecommunications
and Energy on its own motion pursuant to Chapter 123
of the Acts of 2006, § 115, to establish the maximum
rates and fees to be charged by the Massachusetts
Turnpike Authority to wireless providers for the
placement and use of wireless attachments in the central
artery tunnels.

D.T.E. 06-70

**MASSACHUSETTS TURNPIKE AUTHORITY'S MOTION TO ENLARGE TIME
AVAILABLE FOR RESPONSE TO FIRST SET OF INFORMATION REQUESTS TO
THE MASSACHUSETTS TURNPIKE AUTHORITY FROM THE DEPARTMENT**

The Massachusetts Turnpike Authority (the "Authority") hereby moves the Department of Telecommunications and Energy (the "Department") for an enlargement of time until October 10, 2006 to answer or otherwise respond to the First Set of Information Requests to the Massachusetts Turnpike Authority from the Department (the "Department's Requests"). As grounds for this Motion the Authority states as follows:

1. The Department on September 25, 2006 served on the Authority a total of 47 information requests, many of which seek data and/or analysis not previously compiled or undertaken by the Authority.
2. The Authority has been working diligently to respond to the Department's Requests, but despite such diligent efforts, will be unable to complete its responses thereto by the October 1, 2006 deadline established by the Department.

3. The Authority expects to be able to begin providing responses to the Department's requests on October 1, 2006, and expects to provide responses on a rolling basis thereafter.

4. The Authority is also in the process of responding to fifty-three information requests served by the Joint Carriers on September 19, 2006.

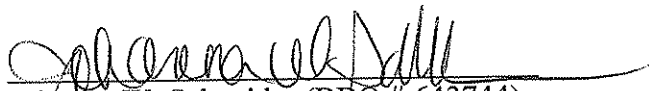
5. Pursuant to the procedural schedule in this matter, the close of discovery is October 23, 2006. If the Authority is permitted to submit its responses on October 10, nearly two full weeks will be available for additional discovery by the Department in this matter.

WHEREFORE, for the foregoing reasons, the Authority respectfully requests that the Department grant it an enlargement of time until October 10, 2006 to answer or otherwise respond to the Department's Requests.

Respectfully submitted,

THE MASSACHUSETTS TURNPIKE
AUTHORITY

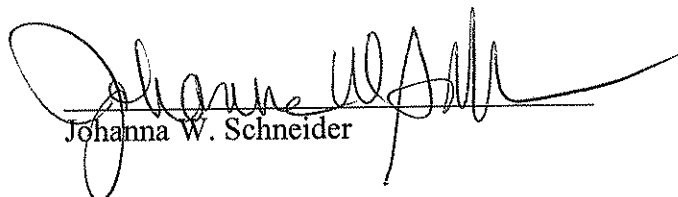
By its attorney,


Johanna W. Schneider (BBO # 643744)
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Dated: September 29, 2006

CERTIFICATE OF SERVICE

Counsel for the Authority hereby certifies that a true copy of the above document was delivered by email and first class mail to the Service List in this proceeding on September 29, 2006.


Johanna W. Schneider